

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO

DR. JILL STEIN, et al., :
: Case No. 24-cv-4042
Plaintiffs, : Judge Michael H. Watson
v. : Mag. Judge Chelsey M. Vascura
FRANK LAROSE, :
Defendants. :

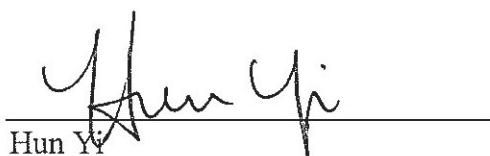
DECLARATION OF HUN YI

I, Hun Yi, hereby state that I am over the age of eighteen years and am competent to testify to the following on the basis of personal, firsthand knowledge:

1. I currently serve as the Director of Investigations in the Public Integrity Unit of the Office of Ohio Secretary of State Frank LaRose. I have served in this position since July 2024. Before I was hired by the Secretary of State's Office, I served in various roles at the Federal Bureau of Investigation for 20 years.
2. As part of my duties as Director of Investigations, I am responsible for receiving and investigating complaints of election fraud and election irregularities. Our Office receives complaints through an online complaint form, through email, and through referrals from other agencies. When conducting an investigation into potential election fraud or election irregularities, I review complaints, interview complainants and other parties with relevant information, review documents submitted by the complainant, and obtain additional documents from witnesses, the boards of elections, and the Secretary's own records. If there is evidence that a crime has been committed, the Public Integrity Unit will refer the matter for prosecution.
3. On September 26, I was assigned to investigate an allegation made by Jason Call, a campaign manager for Jill Stein. The day before, Mr. Call left a voicemail with our Office alleging that the August 28 withdrawal letter submitted by Anita Rios was not signed, submitted, or authorized by Ms. Rios or the Stein campaign.
4. I began my investigation the same day. I telephoned Mr. Call, Ms. Rios, and Philena Farley, the individual who submitted the August 28 withdrawal letter on behalf of Ms. Rios.

5. Ms. Farley informed me that she wrote the August 28 withdrawal letter and affixed Ms. Rios's name to it. Ms. Farley informed me that Ms. Rios called her while she was in the lobby of the Secretary of State's office to submit the withdrawal letter, and they spoke on the phone during her visit. After submitting the paperwork, Ms. Farley texted Ms. Rios to confirm it was done, and Rios replied, "ok thanks."
6. Ms. Rios informed me that she did not authorize Ms. Farley to sign or submit the August 28 letter on her behalf. I requested that Ms. Rios provide a written statement attesting to these facts, including whether Ms. Rios had knowledge of the August 28 letter before it was submitted and whether Ms. Rios authorized Ms. Farley to submit the letter on her behalf. Ms. Rios asked me whether her statement should be notarized. In my experience as an investigator, notarized statements are more helpful in criminal investigations than unsworn statements. If the Secretary's Office refers a suspected election crime to a prosecutor, it is helpful to provide the prosecutor with sworn statements from victims and witnesses. Accordingly, I informed Ms. Rios that a notarized statement would be preferred.
7. As a result of our conversations on September 26, Ms. Rios and Ms. Farley submitted various documents to me.
8. Ms. Farley submitted a timeline of events leading up to the August 28 withdrawal letter comprised of text messages, interoffice messages, emails, and screenshots. A true and correct copy of the timeline document Ms. Farley sent to me is attached hereto as Exhibit A.
9. Ms. Rios submitted two signed—but unsworn—statements. On October 1, I received a signed statement from Ms. Rios dated September 27 stating that she did not give prior authorization “to anyone to present for filing a letter to the Ohio Secretary of State asking that [her] name be removed from the ballot.” A true and correct copy of this statement is attached hereto as Exhibit B. The day I received the statement, I advised Ms. Rios that her statement was not properly notarized because it did not bear a notary stamp. A true and correct copy of my email is attached hereto as Exhibit C. I received a second statement from Ms. Rios on October 4. This statement provided that Ms. Rios did not give “prior authorization to anyone to present for filing a letter to the Ohio Secretary of State asking that [her] name be removed from the ballot.” A true and correct copy of this statement is attached hereto as Exhibit D.
10. As of the date of this declaration, our investigation into this matter is ongoing.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Hun YW
Director of Investigations
Office of the Ohio Secretary of State

Executed on Oct. 18, 2024.

Exhibit A

Timeline

Thursday, September 26, 2024 3:24 PM

JS24 Field

st-ohio

Messages Add canvas Files Bookmarks +

Philena Farley 8:18 AM

Philena Farley 8:32 AM

- According to the Ohio Revised Code, Section 3513.31 (F), if a person nominated by petition as an independent or nonpartisan candidate for election at the next general election withdraws as that candidate or is disqualified as that candidate, the vacancy so created may be filled by a majority of the committee of five designated in the nominating petition.

In your case, since Jill Stein has already filed as an independent candidate and you've submitted her nomination petition with a placeholder VP, she can select a VP and you can update the nomination paperwork.

The code doesn't specify an exact deadline for selecting a VP, but it mentions that the certification of the new VP's name must be made "not later than the eighty-sixth day before the day of the general election."

So, to be safe, Jill Stein should select a VP and you should update the nomination paperwork with the new VP's name no later than **86 days before the general election**. This will ensure compliance with Ohio election laws.

Please double-check with the Ohio Secretary of State's office or a qualified election law attorney to confirm this interpretation and ensure you meet all necessary deadlines and requirements.

No response from the Campaign from my prompt to ChatGPT

Tuesday, July 30th

Philena Farley 8:18 PM

@Rick Lass we're discussing during state committee call that VP candidate has to be updated on August 7th because it's the same date Kamala Harris has to pick a VP in Ohio as well, so we need verification on that.

1 reply

Rick Lass 8:43 PM

thanks. I will bring it up

I got no verification

Friday, August 16th

Philena Farley 9:57 PM

What paperwork do I need to have ready to update Ohio ballot while I'm with them in Chicago?

Saturday, August 17th

Rick Lass 9:48 AM

since you filed a candidate petition not a party petition, probably just a withdrawal letter from Anita and a declaration of candidacy from Butch. **But please wait until they confirm that the petition is valid**

1 reply

2 replies Last reply 30 days ago

----- Forwarded message -----
From: Philena Farley <philena20@gmail.com>
Date: Wednesday, August 28, 2024 at 8:23:26 AM UTC-4
Subject: Ohio Green Party - August 2024 Meeting Notes
To: Ohio GP <ogpcentralcommittee@googlegroups.com>

Ohio Green Party Monthly Meeting Notes - Read.Al

Tuesday, August 27, 2024
7:30 PM**Summary:**

The meeting covered a range of topics, including reporting in-kind donations to the Stein campaign, scheduling of meetings, local voting, and the withdrawal deadline for candidates. Participants expressed concerns about the lack of clarity on the reporting process and the need for receipts for in-kind donations. They also discussed the challenges of scheduling meetings and sending out meeting links to the listserv. The withdrawal deadline for candidates was a pressing issue, with participants expressing confusion and concern about the approaching deadline and its potential impact on the campaign.

The meeting also covered issues related to the Ohio ballot, including the lack of detailed information from Jill Stein's campaign and the challenges of obtaining signatures in certain states. Participants discussed the internal party's shakeups in Indiana and the need for experienced leadership. There was also a discussion about the Hot Times Festival and the need for volunteers and banners for the event.

Finally, participants shared their observations of police behavior at a protest and discussed their experiences at the recent presidential nominating convention(s), including challenges with media coverage and technical issues. They also discussed the need for financial reimbursement for travel expenses related to the convention. Overall, the meeting covered a range of topics related to the Stein campaign and the Green Party, with participants expressing concerns and seeking clarification on various issues.

Chapters & Topics:**Discussion on In-Kind Donations Reporting**

Gwen and Anita engage in a conversation about the reporting of in-kind donations to the Stein campaign. Gwen seeks guidance on the reporting process, expressing uncertainty about the necessity of receipts for small donations, while Anita emphasizes the need for tracking and receipts for reporting in-kind donations. They also discuss the threshold for reporting donations and the handling of specific expenses like phone bills.
*In-kind donations to the Stein campaign

Catching Up and Discussing Meeting Scheduling

Anita, Gwen, and the Ohio Greens members catch up on who is present in the meeting and discuss the scheduling of another Jill Stein campaign meeting for the upcoming Saturday. They also share their experiences and challenges in sending out the meeting link to the listserv and the need to switch the meeting time due to conflicting schedules.

Discussion on Voting for Jill Stein and Meeting Agenda

Gwen Marshall reassures Rev Dorssey that Jill Stein's name will be on the general election ballot, addressing concerns about local voting. The meeting agenda is discussed, with Anita Rios requesting time to talk about the Stein campaign and the National Convention, while Philena Farley plans to send out a newsletter and use a graphic for the Jill Stein meeting announcement.

Discussion on Removing Name from Ballot

Anita Rios expresses her concern about removing her name from the ballot as Vice President and seeks assistance from the group. Gwen suggests seeking information from the local board, and Philena offers to reach out to Howie Hawkins's 2020 campaign managers for help. The discussion revolves around the challenges of finding the right information and the need for urgent action.

Deadline for Candidate Withdrawal

Anita Rios, Philena Farley, and others express uncertainty and anxiety about the looming deadline for vice president candidate withdrawal from the ballot, with

discussions revolving around the specific requirements and implications of the 70th day before the election, as well as the potential consequences of missing the deadline for the campaign.

* Ballot access and deadlines

Ballot Access & Challenges and Campaign Updates

Anita Rios expresses concern over the lack of detailed information about the Ohio ballot and suggests obtaining it from the Secretary of State. Gwen Marshall praises Jill Stein's webpage but raises concerns about in-kind contributions. Philena Farley recounts the incident of sabotage in Indiana, where a non-citizen was included on a petition, leading to its invalidation. Anita Rios attributes the issues in Indiana to lack of experience and internal party shake-ups.

Hot Times Festival and Banner Planning

Anita Rios and others discussed the Hot Times Festival, volunteering needs, and banner planning. They also mentioned printing yard signs, obtaining literature from the campaign website, and the status of the festival application. Becca C expressed concern about the application not being approved yet and requested a report back from Philena on expenses for the DNC events.

* Hot Times Festival and volunteer needs

* Reports from the DNC events and National Convention

Observations on Police Behavior and Green Party Involvement

Philena Farley shares her observations of police behavior at a protest, suggesting that the police may have been ordered not to interfere with Green Party members. She also mentions the arrest of a fellow Green Party member at the RNC protest in Milwaukee. Becca C inquires about the use of banners to identify the Green Party at the protest. Most of the members wore State branded Green Party t-shirts.

Discussion on Convention Experience and Financial Reimbursement

Anita Rios and Philena Farley discuss the challenges faced during the recent convention, such as media blackout, technical glitches, and confusion with delegate reporting. Philena also shares her experience with a discussion on nuclear power and issues with the credentialing process. The section concludes with a conversation about financial reimbursement for travel expenses related to the convention, with Anita offering to make a monthly donation to cover Philena's expenses.

* Treasurer's report and financial contributions

Next Meeting Sept 17th 7:30pm

Action Items:

- * Anita Rios will send out the link to the listserv after the call.
- * Anita Rios will reach out to the campaign to clarify the process for in-kind donations to the Stein campaign.
- * Anita Rios will investigate the deadlines for ballot access and ensure Butch's name is on the ballot.
- * Anita Rios will print up literature on cardstock and mail it to the person in question within the next couple of days.
- * Philena Farley will send receipts for travel expenses to Becca for treasurer reports.
- * Anita Rios will make a monthly donation for the next six months to cover Philena's travel expenses.
- * Becca C will provide a treasurer's report that includes the expenses from the Chicago trip.

Key Questions:

- * What are the deadlines for ballot access and how can we ensure Butch's name is on the ballot?
- * Who can volunteer for the Hot Times Festival and what are the needs?
- * What are the financial contributions and expenses for the Ohio Greens?

I went back to Slack after that call, trying to figure out what to do.

 **Rick Lass** Aug 17th at 9:48 AM
since you filed a candidate petition not a party petition, probably just a withdrawal letter from Anita and a declaration of candidacy from Butch. But please wait until they confirm that the petition is valid

 1 

2 replies

 **Philena Farley** Aug 27th at 8:03 PM
Is there a deadline? I don't know what Howie had to do in 2020. Is there a withdrawal form, or literally writing a letter?
And how do we get the declaration from Butch?

No answer

Sent a message to Howie Hawkins 2020 campaign manager Andrea Mérida Cuéllar

 **ABSOLUTELY**
Aug 27, 2024, 7:53 PM
Hey, do you remember the process to switch that Ohio petition to Howie? We have to switch Anita to Butch.

Sent

No answer

 **Anita Rios** Aug 28, 10:30 AM
When I called back they were telling me that they can take it as received but it's too late to withdraw from the ballot, and I walked out. Then I relayed that message to Anita.
 **Anita Rios** Aug 28, 10:15 AM
I was still waiting in the lobby for someone to come tell me if I was too late to swap VP's.

I told them you have COVID and that is your petition signature. That said they will still receive it as officially submitted today, since this is public information, but no guarantee the ballots can be updated at this point.



Aug 28, 10:49 AM

 **Anita Rios** Aug 28, 12:26 PM
Okay, thanks

Wednesday, August 28th

 **Philena Farley** 8:17 AM
No one has gotten in touch with Anita about how to swap VP's at this point. Let me know if we missed the deadline, or if it matters. Thanks

 **Becca C** Cell Committee Manager RHC in GA

 **Philena Farley** 8:37 AM

No one has gotten in touch with Anita about how to swap VP's at this point. Let me know if we missed the deadline, or if it matters. Thanks

 **Jason Call Campaign Manager JillStein24** 8:37 AM

I replied to Anita's email this morning

I don't know what's exactly in that email.

We were all very frustrated during the state committee call that we didn't have much to go on. But officially, we didn't have a solid plan of action for a letter. I just needed someone to say, 'just leave it as is' but no one did.

Exhibit B

AWTA RIBS
2624 ROBINWOOD DR.
TOLEDO, OH. 43610

METROPLEX MI 480
27 SEP 2024 PM 15 L

OH SECRETARY OF STATE'S OFFICE
200 CIVIC CENTER DR.
COLUMBUS, OH. 43215



To Whom It May Concern:

I, Anita Rios, am the Vice-Presidential candidate on the Ohio ballot with Jill Stein as the Presidential candidate, for the November 2024 general election. I have at no time given prior authorization to anyone to present for filing a letter to the Ohio Secretary of State asking that my name be removed from the ballot, as the Vice Presidential candidate with Jill Stein as the Presidential candidate, for the 2024 election.

9/27/2024


Anita Rios

State of Ohio)
)
) ss:
County of Lucas)

Sworn to before me and subscribed in my presence by Anita Rios at Toledo, Lucas County, Ohio this 27th day of September, 2024.

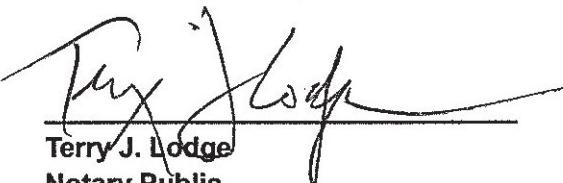

Terry J. Lodge
Notary Public
My commission is nonexpiring

Exhibit C

From: Yi, Hun
To: rhannon@toast.net
Subject: RE: [EXTERNAL] re letter from Anita Rios
Attachments: [image003.png](#)
[Xerox Scan_10012024134927.pdf](#)

Ms. Rios,

Our office received your affidavit via US Postal Service today. In reviewing your affidavit, it was noticed that the notary portion was not completed properly. Per Ohio Revised Code 147.04, a notary public shall obtain the seal of a notary public... The seal may be either type that will stamp ink or one that will emboss...

Please bring this to the attention of your attorney/notary public.

Your affidavit should be signed after you give an oath or affirmation that the statement in the document is true and correct. The signer then signs the document in the presence of a notary public to be notarized with a notary seal. Please work with your attorney to submit your notarized affidavit.

Your affidavit received by the Secretary of State's office is attached to this email for your reference.

Thank you,
Hun



This message and any response to it may constitute a public record and thus may be publicly available to anyone who requests it.

From: Anita Rios <rhannon@toast.net>
Sent: Sunday, September 29, 2024 4:58 PM
To: Yi, Hun <hyi@OhioSOS.Gov>
Subject: [EXTERNAL] re letter from Anita Rios

****Secretary of State Security Notice****

This e-mail is from an external source. Think before you click links or open attachments.

Mr Yi,

Here is a copy of the letter that I signed and put in the mail to you on Friday 9/27/2024.
Please feel free to call me if you need anything else from me.

Anita Rios

To
Whom It May Concern:

I,
Anita Rios, am the Vice-Presidential candidate on the Ohio ballot with Jill Stein as the Presidential candidate, for the November 2024 general election. I have at no time given prior authorization to anyone to present for filing a letter to the Ohio Secretary of State asking that my name be removed from the ballot, as the Vice Presidential candidate with Jill Stein as the Presidential candidate, for the 2024 election.

**Anita
Rios**

**State
of Ohio
)**

**)
ss:
County
of Lucas
)**

**Sworn
to before me and subscribed in my presence by Anita Rios at
Toledo, Lucas County, Ohio this 27th day of September, 2024.**

Terry J. Lodge

Notary Public

**My commission
is nonexpiring**

Exhibit D

Retail



PRESS FIRMLY TO SEAL



PRIORITY MAIL



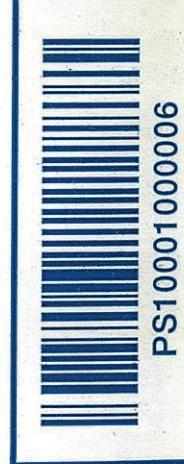
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CUSTOMER USE ONLY	
FROM: (PLEASE PRINT)	PHONE (419) 462-6618
ANITA RIOS 2426 ROBINWOOD AVE. TOLEDO, OHIO 43610	
DT	
<input type="checkbox"/> SIGNATURE REQUIRED Note: The mailer must check the "Signature Required" box if the mailer: ① Purchases Return Receipt service; OR ② Purchases additional insurance; OR ③ Purchases COD services; OR ④ mail is recyclable or one secure location. If the box is not checked, the Postal Service will obtain the item from the addressee's delivery options: <input type="checkbox"/> No Saturday Delivery (delivered next business day) <input type="checkbox"/> Sunday/Holiday Delivery Required (additional fee, where available) *Refer to USPS.com® or local Post Office® for availability.	
TO: (PLEASE PRINT) OH. SEC. OF STATE 200 Civic Center Dr. COLUMBUS, OHIO 43215 ATTN: 400 Y/ ZIP + 4® (U.S. ADDRESSES ONLY)	
DELIVERY OPTIONS (Customer Use Only) <input type="checkbox"/> 1-Day <input type="checkbox"/> 2-Day Scheduled Delivery Date (MM/DD/YY) 10-3-24 Date Accepted (MM/DD/YY) 10-3-24 Scheduled Delivery Time 6:00 PM Time Accepted 10-3-24 <input type="checkbox"/> AM <input checked="" type="checkbox"/> PM Special Handling/Fragile \$ Sunday/Holiday Premium Fee \$ Weight 1.01 lbs. <input type="checkbox"/> Flat Rate 1.80 oz. Accepts Employee In-Box \$ DELIVERY (POSTAL SERVICE USE ONLY) Delivery Attempt (MM/DD/YY) Time AM PM Employee Signature 30.45	
<input type="checkbox"/> For pickup or USPS Tracking™, visit USPS.com or call 800-222-1811. <input type="checkbox"/> \$100.00 Insurance Included.	
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PRIORITY MAIL

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This package is made from post-consumer waste. Please recycle - again.

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U.S. POSTAGE

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TOLEDO, OH

OCT 02, 2024



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MAIL
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FROM: (PLEASE PRINT)

PHONE 4/9 402-6618

ANITA RIOS
2426 ROBINWOOD AVE.
TOLEDO, OH, 43610 DT

PAYMENT BY ACCOUNT (if applicable)
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Federal Agency Acct. No. or Postal Service® Acct.

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DELIVERY OPTIONS (Customer Use Only)

SIGNATURE REQUIRED Note: The mailer must check the "Signature Required" box if the mailer: 1) Purchases Return Receipt service; OR 2) Purchases additional insurance; OR 3) Purchases COD services; OR 4) mail repeatable or one secure location. If the box is not checked, the Postal Service will place the item in the addressee's Delivery Options

No Saturday Delivery (delivered next business day)

Sunday/Holiday Delivery Required (additional fee, where available)

*Refer to USPS.com® or local Post Office® for availability.

TO: (PLEASE PRINT)

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MITA RIOS
1626 ROBINWOOD AVE.
TOLEDO, OHIO 43610

Ohio Sec. of STATE
200 Civic Center Dr.
Columbus, OH. 43215

ATTN: Hon Yr. Peace INTEGRITY DIVISION



10/21/2024

To Whom It May Concern:

I, Anita Rios, am the Vice-Presidential candidate on the Ohio ballot with Jill Stein as the Presidential candidate, for the November 2024 general election. I have at no time given prior authorization to anyone to present for filing a letter to the Ohio Secretary of State asking that my name be removed from the ballot, as the Vice Presidential candidate with Jill Stein as the Presidential candidate, for the 2024 election.

Anita Rios
Anita Rios

Mandy Parton
10/21/2024

